

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN INC., *et al.*,¹

Debtors.

)
) Chapter 11
)

) Case No. 25-10068 (CTG)
)

) (Jointly Administered)
)

) **Re: Docket Nos. 420 & 453**
)

**CERTIFICATION OF
COUNSEL REGARDING
APPLICATION OF THE DEBTORS PURSUANT
TO 11 U.S.C. §§ 105 (a) AND 363(b) TO (I) RETAIN
ALVAREZ & MARSAL NORTH AMERICA, LLC TO
PROVIDE THE DEBTORS AN INTERIM CHIEF EXECUTIVE
OFFICER, AND INTERIM CHIEF FINANCIAL OFFICER, AND
CERTAIN ADDITIONAL PERSONNEL, (II) DESIGNATE MICHAEL
PRENDERGAST AS INTERIM CHIEF EXECUTIVE OFFICER, AND
(III) DESIGNATE JEFFREY DWYER AS INTERIM CHIEF FINANCIAL OFFICER
FOR THE DEBTORS, IN EACH CASE EFFECTIVE AS OF THE PETITION DATE**

The undersigned counsel to Joann, Inc. and certain of its affiliates, the debtors and debtors in possession in the above-captioned cases (collectively, the “Debtors”), hereby certifies as follows:

1. On February 13, 2025, the *Application of the Debtors Pursuant to 11 U.S.C. §§ 105(a) and 363(b) to (I) Retain Alvarez & Marsal North America, LLC to Provide the Debtors an Interim Chief Executive Officer, and Interim Chief Financial Officer, and Certain Additional Personnel, (II) Designate Michael Prendergast as Interim Chief Executive Officer, and (III) Designate Jeffrey Dwyer as Interim Chief Financial Officer for the Debtors, in Each Case*

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors’ mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

Effective as of the Petition Date [Docket Nos. 420] (the “Application”) was filed under seal with the United States Bankruptcy Court for the District of Delaware (the “Court”). Attached thereto as Exhibit A was a proposed form of order granting the relief requested in the Motion (the “Proposed Order”). On February 18, 2025, the Debtors filed a redacted version of the Application [Docket No. 453].

2. A hearing on the Application was set to be held on March 6, 2025, at 2:00 p.m. (prevailing Eastern Time) and any objections or responses to entry of the Proposed Order were to be filed and served on the undersigned proposed counsel by February 27, 2025, at 4:00 p.m. (prevailing Eastern Time) (the “Objection Deadline”), except for the Office of the United States Trustee for the District of Delaware (the “U.S. Trustee”) whose deadline was extended to March 3, 2025, at 4:00 p.m. (prevailing Eastern Time).

3. Prior to the Objection Deadline, the Debtors received informal comments to the Proposed Order from the U.S. Trustee.

4. The Debtors revised the Proposed Order to address the informal comments received from the U.S. Trustee, and the parties agreed to a revised form of order, a copy of which is attached hereto as **Exhibit 1** (the “Revised Order”).

5. A blackline comparing the Revised Order against the Proposed Order is attached hereto as **Exhibit 2**.

6. The Debtors respectfully request that the Court enter the Revised Order at its earliest convenience.

Dated: March 4, 2025
Wilmington, Delaware
/s/ Patrick J. Reilley

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